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**Hearing Date: February 2,  
2022 at 10:00 am**

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*Counsel to the Defendant Global Bankers Insurance Group, LLC,  
now known as Aspida Financial Services, LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PB LIFE AND ANNUITY CO., LTD., *et. al.*,

Debtors in Foreign Proceedings.

Chapter 15

Case No. 20-12791 (LGB)  
(Jointly Administered)

UNIVERSAL LIFE INSURANCE COMPANY,

Plaintiff,

v.

GREG E. LINDBERG, individually, CHRIS  
HERWIG, individually, AAPC HOLDINGS,

Adversary Proceeding  
Case No. 21-01169

LLC, ACADEMY FINANCIAL ASSETS, LLC, AGH PARENT, LLC, ALPINE CAPITAL, LLC, ASIM HOLDINGS, LLC, ASL HOLDINGS, LLC, ATKINSON, LLC, ATLANTIC COAST LIFE INSURANCE COMPANY, ATLAS FINANCIAL INVESTMENTS, LLC, AUGUSTA ASSET MANAGEMENT, INC., BEGONIA EIGHT, LLC, BLH CAPITAL, LLC, BLUE DAFFODIL, LLC, BLUE VIOLET, LLC, CAPITAL ASSETS FUND I, LLC, CAPITAL ASSETS FUND II, LLC, CAPITAL ASSET MANAGEMENT I, LLC, CAPITAL ASSETS MANAGEMENT II, LLC, CAPITAL ASSETS MANAGEMENT III, LLC, CARNATION THREE, LLC, CHATSWORTH ASSET MANAGEMENT, LLC, CHRYSANTHEMUM TWO, LLC, CSI INTERCO, LLC, DAHLIA TEN, LLC, DAISY SEVEN, LLC, DRUMMOND GROUP, LLC, DUNHILL HOLDINGS, LLC, ELI GLOBAL, LLC, ENGLERT HOLDINGS, LLC, EPPING, LLC, ERIE PROPERTIES, LLC, FLAGSHIP HOLDINGS, LLC, FLEET ASSIST INTERCO LIMITED, FLOWERY BRANCH, LLC, FORSYTH, LLC, FORTREX, LLC, GBIG CAPITAL, LLC, GBIG HOLDINGS, INC., GBI GROUP, LLC, GERANIUM TWO, LLC, GILFORD ASSET MANAGEMENT, LLC, GLOBAL BANKERS INSURANCE GROUP, LLC, GLOBAL GROWTH HOLDINGS, INC., GLOBAL INSURANCE CAPITAL, LLC, GREENFIELD CAPITAL, LLC, HAMPTON ASSET MANAGEMENT, INC., HANSEN AEROSPACE, LLC, HEALTHLINK HOLDINGS, LLC, HOOKSETT, LLC, HUTCHISON LAW GROUP, PLLC, INTEGRITY EMR HOLDINGS, LLC, INTEGRITY EMR, LLC, IRON CITY ASSET MANAGEMENT, INC., ITECH FUNDING, LLC, JACKSON ASSET MANAGEMENT, INC., KITE ASSET MANAGEMENT, INC., LILAC SIX, LLC, MACON, LLC, MORNING MOUNTAIN HOLDINGS, LLC, NETHERLANDS INSURANCE HOLDINGS, INC., NEW ENGLAND CAPITAL, LLC, NIH CAPITAL,

LLC, NOM GB 2018 I, LLC,  
PARADIGM PARK HOLDINGS, LLC,  
PARALLEL CAPITAL ASSETS, LLC,  
PERSHING, LLC, RED BEGONIA, LLC,  
REVOLVERCAP PARTNERS FUND, LP,  
SATORI WATERS, LLC, SEDWICK,  
LLC, SENTINEL SECURITY LIFE  
INSURANCE  
COMPANY, SOMERSWORTH, LLC,  
STANDARD ADVISORY SERVICES, LTD,  
STANDARD FINANCIAL LIMITED,  
STANDARD INVESTMENT CAPITAL, LTD,  
TREATMENT RESOURCES OF MARGATE,  
INC., TRITON FINANCIAL LIMITED, TUX  
HOLDINGS, LLC, TYBEE ISLAND ASSET  
MANAGEMENT, LLC, UKAT HOLDINGS, LLC,  
UKAT INVESTMENT LIMITED, VERDESIA  
LIFE SCIENCES, LLC, WEARE, LLC,  
YELLOW LOTUS, LLC, YELLOW  
SUNFLOWER, LLC, UBS FINANCIAL  
SERVICES, INC., GOLDMAN SACHS  
LENDING PARTNERS, LLC, CREDIT SUISSE  
AG CAYMAN ISLANDS BRANCH,  
GOLDMAN SACHS BANK USA, MORGAN  
STANLEY SENIOR FUNDING, INC., THE  
BRYN MAWR TRUST COMPANY, and DOES  
1 through 10, inclusive,

Defendants.

**NOTICE OF MOTION OF DEFENDANT ASPIDA FINANCIAL SERVICES, LLC  
(F/K/A GLOBAL BANKERS INSURANCE GROUP, LLC) TO DISMISS OR,  
ALTERNATIVELY, TO ABSTAIN**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum Of Law Of  
Aspida Financial Services, LLC (f/k/a Global Bankers Insurance Group, LLC) in Support of  
Motion to Dismiss the Amended Complaint, or, in the Alternative, Abstain, the Defendant  
Aspida Financial Services, LLC (“Aspida”) will move before the Honorable Lisa G. Beckerman  
of the United States Bankruptcy Court for the Southern District of New York (the “Court”) for

an order dismissing the adversary proceeding filed by Universal Life Insurance Company as against Aspida pursuant to Rules 9(b), 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, as made applicable by the Federal Rules of Bankruptcy Procedure, that, alternatively, the Court abstain from exercising jurisdiction over the claims in the Amended Complaint as against Aspida and such further relief as may be deemed just, on **February 2, 2022 at 10:00 am (prevailing Eastern time)** (the “Hearing”). The Hearing will be conducted remotely through Zoom for Government. Parties are required to register to appear at Court hearings using the Bankruptcy Court’s eCourt Appearances tool at the following link:

<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl> Case participants must check in to confirm their appearance not later than 4:00 p.m., one (1) business day prior to the scheduled hearing date.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, the Defendant Aspida does not consent to the entry of final orders or judgment by this Court.

ASPIDA FINANCIAL SERVICES, LLC, FORMERLY  
KNOWN AS GLOBAL BANKERS INSURANCE  
GROUP, LLC

by its attorneys,

/s/ Alan F. Kaufman

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Dated: December 13, 2021

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: December 13, 2021

/s/ Alan F. Kaufman  
Alan F. Kaufman